

Seymour Wasserstrum, Esq. SW2734
Law Offices of Seymour Wasserstrum
Attorney at Law
205 W. Landis Avenue
Vineland, NJ 08360
P: (856) 696-8300
F: (856) 696-6962
Mylawyer7@aol.com
Attorney for the Debtor

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: Tanisha I. Green

Case No: 23-17427/ABA
Chapter 13

**NOTICE OF MOTION TO PERMIT POST BAR DATE PROOF OF CLAIM FILING ON
BEHALF OF INTERNAL REVENUE SERVICE & LANDLORD, JAY MAPLE
APARTMENTS**

HEARING DATE: March 19, 2024, at 10:00am

TO:

Andrew B. Finberg
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

AND ALL CREDITORS

and their counsel – see attached service list

PLEASE TAKE NOTICE that on the 19th of March 2024 at 10:00 am, the undersigned attorney for Debtor shall make an application to this Honorable Court to permit post bar date proof of claim filing on behalf of **INTERNAL REVENUE SERVICE & LANDLORD, JAY MAPLE APARTMENTS.**

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached Certification of attorney, Seymour Wasserstrum, the arguments of counsel and such other and further proofs as may be adduced at the hearing hereof.

PLEASE TAKE FURTHER NOTICE that the moving party believes that no brief is necessary in support of the within application due to the fact that the matter involves no complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file opposition with the office of the Clerk of the Bankruptcy Court, and serve upon the undersigned, 7 days in advance of the aforesaid hearing, your responding papers stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

Dated: 02/26/2024

/s/ Seymour Wasserstrum, Esq.

Seymour Wasserstrum, Esq.

Attorney for Debtor